



## North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor  
Dee Freeman, Secretary

October 18, 2010

Sent Via U.S. Mail and Via Email – [tbuck@toknc.com](mailto:tbuck@toknc.com)

Mr. Thad Buck  
Town of Kernersville  
Solid Waste Superintendent  
P.O. Box 728  
Kernersville, NC 27284

**Re: WARNING NOTICE  
Environmental Monitoring Reporting Deficiencies  
Town of Kernersville Landfill, Forsyth County, Permit #34-04**

Dear Mr. Buck:

The Solid Waste Section has completed a review of the December 30, 2009 (Doc ID 11451) and June 1, 2010 (Doc ID 11452) water quality results submitted via email by the Town of Kernersville on July 19, 2010. Based upon this review, the Solid Waste Section has found deficiencies in your environmental monitoring reporting that has failed to meet the following requirements: submitting laboratory analytical data in a format consistent with the Electronic Data Deliverable (EDD) template established by the Solid Waste Section and not submitting the analytical laboratory reports containing the QA/QC data. The EDD is required to be submitted in an electronic spreadsheet format, and a paper copy of the EDD is not acceptable.

On October 27, 2006 the North Carolina Solid Waste Section issued a memorandum titled *New Guidelines for Electronic Submittal of Environmental Monitoring Data*. Two additional memoranda were also issued by the North Carolina Solid Waste Section regarding environmental monitoring, the February 23, 2007 memorandum titled *Addendum to October 27, 2006, North Carolina Solid Waste Section Memorandum Regarding New Guidelines for Electronic Submittal of Environmental Data* and the October 17, 2007 memorandum titled *Environmental Monitoring Data for North Carolina Solid Waste Management Facilities*. All three memoranda have been available on our webpage for over three years ([http://www.wastenotnc.org/swhome/enviro\\_monitoring.asp](http://www.wastenotnc.org/swhome/enviro_monitoring.asp)). The EDD template is also located on our webpage at <http://portal.ncdenr.org/web/wm/sw/envmonitoring>. The EDD template standardizes the environmental reporting process, eliminates the need for laboratories to submit paper copies of analytical results to the Solid Waste Section, reduces the labor intensive data entry by Solid Waste Section, improves efficiency, and ensures consistency of stored data.

In addition, the February 23, 2007 memorandum titled *Addendum to October 27, 2006, North Carolina Solid Waste Section Memorandum Regarding New Guidelines for Electronic Submittal of Environmental Data*, stated, "Failure to comply with the requirements described in the October 27, 2006 memorandum and this addendum to the October 27, 2006, memorandum will constitute a violation of 15A NCAC 13B .0601, .0602, or .1632(b), and submittal of unacceptable data may lead to enforcement action."

As a result, it is the Town of Kernersville's responsibility to ensure that all environmental monitoring results are reported as required by the Solid Waste Section and your immediate attention is required. Please submit the current EDD spreadsheets (in an electronic format) and the QA/QC data (in pdf or tiff format) for the December 2009 and June 2010 water quality sampling events within 10 days of receipt of this letter.

For all future water quality sampling events, please submit the laboratory analytical data in an electronic format consistent with the EDD template established by the Solid Waste Section and submit all analytical laboratory reports containing the QA/QC data in an electronic format. Failure to comply may lead to enforcement action. Also, please forward all the groundwater information via email to [jaclynne.drummond@ncdenr.gov](mailto:jaclynne.drummond@ncdenr.gov). Mr. Bobby Lutfy is no longer with the Solid Waste Section.

In addition, based upon a review of the December 2009 and June 2010 sampling results, the downgradient groundwater monitoring wells GW2, GW3S, GW3D, and GW4 are in violation of the NC Groundwater Standards. Also, based upon a review of the February 8, 1996 report, *Ground and Surface Water Quality Investigation at Kernersville Closed Municipal Sanitary Landfill*, a groundwater assessment was conducted at the facility. Exceedances of the NC Groundwater Standards were also detected at this time at the facility.

Finally, the Piedmont Landfill and Recycling Center, Permit #34-06, located adjacent to the Town of Kernersville Landfill had been collecting their upgradient surface water samples from a sampling point named SW-1 since 1994 that was located less than 50 feet from the edge of waste of the Town of Kernersville Landfill. Historically the samples collected from surface water sampling point SW-1 have indicated detections of several volatile organic compounds over the years including 1,1-dichloroethane, cis,-1,2-dichloroethene, vinyl chloride, and acetone. All of these volatile organic compounds are common liquid leachate constituents, and it appears that the contamination detected in SW-1 was likely from the Town of Kernersville Landfill. Therefore, Waste Management submitted a request to modify their water quality monitoring plan in the *Request to Eliminate Surface Water Sampling Point SW-1* for the Piedmont Landfill and Recycling Center dated February 1, 2010 (Doc ID 10833). The Solid Waste Section approved this request on July 15, 2010 (Doc ID 11140). As a result, the Town of Kernersville is required to add the Piedmont Landfill and Recycling Center's former SW-1 location to their routine semiannual sampling events and submit a revised water quality monitoring plan (WQMP) to include the SW-1 location within 60 days of receipt of this letter. Please begin sampling the new surface water sampling location during the next scheduled semiannual water quality sampling event for the facility. If volatile organic compounds continue to be detected within the new SW-1 surface water sampling location and continue to exceed the NC Groundwater Standards within the groundwater monitoring wells during the next two semiannual water quality sampling events at the facility, then additional groundwater assessment and/or corrective will be required at the facility pursuant to 15A NCAC 2L .0106 (d)(1), 15A NCAC 2L .0106(d)(2), and the December 10, 1991 Closure Letter [referencing the surface water requirements of Section .0503 (2)(c) and the groundwater requirements of Section .0503 (2)(d)].

If you have any questions or concerns regarding this letter, please contact me at 919-508-8500 or at [jaclynne.drummond@ncdenr.gov](mailto:jaclynne.drummond@ncdenr.gov). Thank you for your anticipated cooperation with this matter.

Sincerely,



Jaclynne Drummond  
Hydrogeologist  
Environmental Compliance  
Solid Waste Section

cc via email: Curtis Swisher, Town Manager (cswisher@toknc.com)  
Mary McClellan, Sanitation and Recycling Specialist (MMcClellan@toknc.com)  
Sid Champion, Research and Analytical Labs (ralcc2@triad.rr.com)  
Mark Poindexter, Field Operations Supervisor  
Jason Watkins, Central District Supervisor  
John Patrone, Environmental Senior Specialist